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12 *Attorneys for Defendant*
13 *Maxwell & Morgan, P.C., erroneously sued*
14 *as Maxwell & Morgan, Corp.*

15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 * * *

18 Glenkirk D. Peters,
19 Plaintiff,

20 vs.
21

22 Maxwell & Morgan, Corp.,
23
24 Defendant.

) CASE NO.: 2:18-cv-01399-GMN-GWF
)
) **STIPULATION AND JOINT**
) **REQUEST TO CONTINUE**
) **DEADLINE TO FILE STIPULATED**
) **DISCOVERY PLAN**
) **(FIRST REQUEST)**

1 IT IS HEREBY STIPULATED by and between Plaintiff Glenkirk D. Peters
2 (“Peters”) and defendant Maxwell & Morgan, P.C., erroneously sued as Maxwell &
3 Morgan, Corp. (“M&M”) (collectively, the “Parties”), by and through the
4 undersigned counsel of record, as follows:

5 1. On July 27, 2018, Peters filed the original Complaint in this action,
6 Docket No. 1.

7 2. On October 9, 2018, Peters filed a First Amended Complaint (“FAC”) in
8 this action, Docket No. 17.

9 3. On October 19, 2018, the Parties held their discovery conference under
10 Fed. R. Civ. P. 26(f) and Local Rule 26-1(a).

11 4. On October 23, 2018, M&M filed its motion to dismiss Peters’s FAC,
12 Docket No. 20.

13 5. Pursuant to Local Rule 26-1, the Parties’ deadline to file a stipulated
14 discovery plan and scheduling order is November 8, 2018. After meeting and
15 conferring, Defendant has requested and Plaintiff has agreed to continue the deadline
16 by thirty (30) days.

17 6. Defendant believes it is premature to set a discovery plan or case
18 schedule at this time, given M&M’s pending motion to dismiss the FAC. Plaintiff
19 disagrees. The Parties request additional time to explore the possibility of filing a
20 joint discovery plan and scheduling order, instead of unilateral filings. Accordingly,
21 good cause exists to continue the deadline to file a stipulated discovery plan and
22 scheduling order by thirty (30) days.

23 7. This is the first stipulation for continuance of the deadline to file a
24 stipulated discovery plan and scheduling order.

1 Accordingly, Peters and M&M, by and through their respective counsels,
2 hereby stipulated that the Parties may have up to and including December 10, 2018
3 to file a stipulated discovery plan and scheduling order.

4 **IT IS SO STIPULATED.**

5 DATED this 6th day of November, 2018.

6
7
8 KAZEROUNI LAW GROUP, APC

SIMMONDS & NARITA LLP

9 /s/ Michael Kind

/s/Liana Mayilyan

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14
15 IT IS SO ORDERED:

16
17 

18 UNITED STATES MAGISTRATE JUDGE

19
20 DATED: 11/07/2018

I hereby certify that on November 6, 2018, I electronically filed the attached document to the Clerk's Office using the CM/ECF system for the United States District Court for the District of Nevada. I further certify that the following counsel for Plaintiff are registered CM/ECF users and that service will be accomplished upon them using the CM/ECF system:

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PETERS v. MAXWELL & MORGAN, CORP. (CASE NO.: 2:18-cv-01399-GMN-GWF)
STIPULATION AND JOINT REQUEST TO CONTINUE DEADLINE TO FILE STIPULATED
DISCOVERY PLAN